

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI**

MISSOURI STATE CONFERENCE OF)
THE NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE, REDDITT HUDSON,)
F. WILLIS JOHNSON and)
DORIS BAILEY,)

Plaintiffs,)

v.)

FERGUSON-FLORISSANT SCHOOL)
DISTRICT and ST. LOUIS COUNTY)
BOARD OF ELECTIONS)
COMMISSIONERS,)

Defendants.)

Civ. No. 4:14-cv-02077-RWS

DECLARATION OF SOPHIA LIN LAKIN

I am an attorney representing all Plaintiffs in the above-captioned lawsuit. I am over eighteen years of age and have personal knowledge of the facts to which I attest in this Declaration.

The below documents, attached to this Declaration, were produced to Plaintiffs by Defendants in the course of discovery. I hereby attest to their authenticity.

1. Attached hereto as Exhibit H1 to Plaintiffs' Statement of Uncontroverted Facts is a true and correct copy of the Minutes of the November 13, 2013 FFSD Board Meeting.

2. Attached hereto as Exhibit H2 to Plaintiffs' Statement of Uncontroverted Facts is a set of hyperlinks to three videos produced by Defendants to Plaintiffs:

(A) November 13, 2013 Board Meeting,

<https://www.youtube.com/watch?v=zmWqO20tbsw;>

(B) April 3, 2014 Candidate Forum,

<https://www.youtube.com/watch?v=ewuStFb5uBc>; and

(C) March 6, 2014 Candidate Forum,

https://www.youtube.com/watch?v=c6ZR_sNW66o.

3. Attached hereto as Exhibit H3 to Plaintiffs' Statement of Uncontroverted Facts is a true and correct copy of Minutes of the Regular December 11, 2013 FFSD Board Meeting.

4. Attached hereto as Exhibit H4 to Plaintiffs' Statement of Uncontroverted Facts is a true and correct copy of Minutes of the Closed December 11, 2013 FFSD Board Meeting.

5. Attached hereto as Exhibit H5 to Plaintiffs' Statement of Uncontroverted Facts is a true and correct copy of Minutes of the March 12, 2014 FFSD Board Meeting.

Dated this 30th day of September, 2015. Respectfully submitted,

/s/ Sophia Lin Lakin
SOPHIA LIN LAKIN*
ACLU Voting Rights Project
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 519-7836

** appearing pursuant to Local Rule 12.01(F)*

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Sophia Lin Lakin, hereby certify that on September 30, 2015, I filed the foregoing document using the e-filing system, thereby serving electronic copies via email to all named parties below:

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Respectfully Submitted,

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